

EXHIBIT 1

From: [Luke Nelson](#)
To: srand-lewis@randandrand-lewisplcs.com
Cc: [John Edson](#)
Subject: Stipulation re Damages (Lawler v. Allstate et al.)
Date: Monday, March 25, 2024 11:37:01 AM
Attachments: [Lawler - Stipulation to Remand 4891-3538-5265 v.1.docx](#)

Good morning Suzanne,

My name is Luke Nelson. I am working with John Edson on the Lawler v. Allstate et al. case. Will plaintiffs stipulate that their damages, inclusive of fees and costs, do not exceed \$75,000 and they will not seek to recover an amount over \$75,000 from defendants? In exchange, defendants will agree to remand this case to state court. Please let me know no later than 5:00 p.m. on Wednesday, March 27 whether you are agreeable to this.

I have attached a stipulation for your review. If you do not have any proposed changes, please sign and return it so that I may file it with the court.

Thank you,

Luke

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Company, John Alsop Insurance Agency,
9 and Eric Alsop

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
12

13 MONIQUE LAWLER, DARYL
14 LAWLER,

15 Plaintiffs,

16 v.

17 ALLSTATE INSURANCE
COMPANY, JOHN ALSOP
18 INSURANCE AGENCY, ERIC
ALSOP, DOES 1 through 100,

19 Defendants.
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Case No. 2:24-cv-01442-AB-SK

Hon. André Birotte Jr.
Courtroom 7B

**STIPULATION TO REMAND CASE
TO STATE COURT AND LIMIT
PLAINTIFFS' DAMAGES**

Complaint Filed: January 26, 2024
Trial Date: TBD

STIPULATION

This Stipulation is entered into by and between plaintiffs Monique and Daryl Lawler (“Plaintiffs”) on the one hand, and defendants Allstate Insurance Company (“Allstate”), John Alsop Insurance Agency, and Eric Alsop (collectively, “Defendants”) on the other, by and through their counsel of record, with respect to the following:

WHEREAS, on January 26, 2024, Plaintiffs filed a complaint in the Superior Court of California for the County of Los Angeles, entitled *Monique Lawler, et al. v. Allstate Insurance Company, et al.*, Case No. 24STCV02095 (the “state court action”);

WHEREAS, on February 22, 2024, Allstate removed the state court action to the United States District Court for the Central District of California, Case No. 2:24-cv-01442-AB-SK (the “District Court”);

WHEREAS, on March 22, 2024, Plaintiffs filed an Application for an order to remand this matter back to the state court, arguing, among other things, that the amount in controversy does not exceed \$75,000 (Dkt. 15);

WHEREAS, as a condition to Defendants agreeing to remand this matter to state court, Plaintiffs agree that they will not seek, and agree they cannot recover, more than \$75,000 in total damages, inclusive of fees and costs, from Defendants; and

WHEREAS, counsel for the parties agree, represent and warrant that they have full client authority to enter into this Stipulation and that lack of consent will never be raised as a defense to the enforceability of this agreement.

NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

1. Defendants agree that the District Court may remand this matter back to the Superior Court of California for the County of Los Angeles for further proceedings;

